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1 IN THE UNITED STATES DISTRICT COURT
 2 FOR THE WESTERN DISTRICT OF NORTH CAROLINA
 3 CHARLOTTE DIVISION
 4 CASE NO. 3:16-cv-00695GCM

5 BARONIUS PRESS, LTD.,)
 6 Plaintiff,)
 7 vs.)
 8 SAINT BENEDICT PRESS, LLC)
 9 Defendant.)
 10 _____)

11 VIDEOTAPE 30B(b)(6) DEPOSITION OF BARONIUS PRESS, LTD.

12 BY PAVEL KEJIK

13 (Taken by Defendant)

14 Charlotte, North Carolina

15 Wednesday, March 21, 2018

16 VOLUME I

17 Reported in Stenotype by
 18 Mary L. Labonte, RPR
 19 Transcript produced by computer-aided transcription

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1 APPEARANCES

2 ON BEHALF OF THE PLAINTIFF:

3 MARK W. ISHMAN, ESQUIRE
 4 ISHMAN LAW FIRM, P.C.
 Forum I Building
 5 8601 Six Forks Road, Suite 400
 Raleigh, North Carolina 27615
 6 919.468.3266
 mishman@ishmanlaw.com

7 ON BEHALF OF THE DEFENDANT:

8 NATALIE D. POTTER, ESQUIRE
 9 JONATHAN E. BUCHAN, ESQUIRE
 10 ESSEX RICHARDS, PA
 11 2710 South Boulevard
 12 Charlotte, North Carolina 28203
 13 704.377.4300
 14 npotter@essexrichards.com
 jbuchan@essexrichards.com

15 ALSO PRESENT:

16 SEAN LOWTHER, VIDEOGRAPHER

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1 On March 21, 2018, commencing at 9:08 a.m., the
 2 Videotape 30(b)(6) Deposition of BARONIUS PRESS, LTD.,
 3 BY PAVEL KEJIK was taken pursuant to notice and
 4 pursuant to Rules 26 and 30 of the Federal Rules of
 5 Civil Procedure on behalf of the Defendant, at the law
 6 offices of Essex Richards, 1701 South Boulevard,
 7 Charlotte, North Carolina.

8 THE VIDEOGRAPHER: Today's date is
 9 March 21, 2018. The time on the monitor is
 10 approximately 9:08 a.m. and we're now on the record.
 11 Here begins volume one, media number one, in the
 12 30(b)(6) deposition of Paul Kejik in the matter of
 13 Baronius Press, Ltd., Plaintiffs, versus Saint
 14 Benedict Press LLC, Defendants.

15 The case is in the United States District
 16 Court for the Western District of North Carolina,
 17 Charlotte Division, Case Number 3:16-cv-00695-GCM.
 18 Location of the deposition is the law
 19 offices of Essex Richards, P.A. at 1701 South
 20 Boulevard, Charlotte, North Carolina 28203.

21 My name is Sean Lowther, videographer, and
 22 the court reporter is Mary Labonte and we're
 23 representing CaseWorks Court Reporting.

24 If counsel would please state your name and
 25 whom you represent, starting with Attorney Potter.

<p>Page 21</p> <p>1 in the United States.</p> <p>2 Q. Okay. How many employees does Baronius</p> <p>3 Press have?</p> <p>4 A. Zero.</p> <p>5 Q. Zero employees. How is Mr. Healy</p> <p>6 compensated?</p> <p>7 A. He gets paid for his work he does, if he</p> <p>8 gets paid.</p> <p>9 Q. What does Mr. Healy do?</p> <p>10 A. Whatever I contract him to do.</p> <p>11 Q. Such as what?</p> <p>12 A. Research, organizing things, finding people.</p> <p>13 Q. What kind of research?</p> <p>14 A. Research on printers, editors, shipping,</p> <p>15 acquiring rights.</p> <p>16 Q. And you said "organizing." What kind of</p> <p>17 organizing does he do?</p> <p>18 A. For example organizing shipping.</p> <p>19 Q. Would he organize shipping to the United</p> <p>20 States?</p> <p>21 A. As well.</p> <p>22 Q. And "finding people" you stated. Who is he</p> <p>23 finding?</p> <p>24 A. Contractors, translators, editors.</p> <p>25 Q. What kind of contractors?</p>	<p>Page 23</p> <p>1 Q. Such as what?</p> <p>2 A. Sending out letters.</p> <p>3 Q. What kind of letters?</p> <p>4 A. Chase letter for outstanding payment.</p> <p>5 Q. What else does she do?</p> <p>6 A. For us?</p> <p>7 Q. Uh-huh.</p> <p>8 A. I think that's pretty much all of it.</p> <p>9 Q. Is Ms. Lorenz an attorney?</p> <p>10 A. No.</p> <p>11 Q. Does she -- she doesn't perform any other</p> <p>12 admin duties on behalf of Baronius?</p> <p>13 A. I don't know what admin duties, what do you</p> <p>14 mean by that?</p> <p>15 Q. You said -- I'm sorry. You said earlier</p> <p>16 that she performs some administrative duties.</p> <p>17 A. Sending out letters, signing forms on our</p> <p>18 behalf if necessary if they cannot be done by us.</p> <p>19 Q. What kind of forms?</p> <p>20 A. Any that needs to be done.</p> <p>21 Q. Does that include legal forms?</p> <p>22 A. I don't know what do you mean by legal</p> <p>23 forms.</p> <p>24 Q. Does she sign applications for you? Does</p> <p>25 she sign -- you tell me. You're telling me that she</p>
<p>Page 22</p> <p>1 A. That's what I said, translators, editors.</p> <p>2 Q. Does Baronius Press currently collect and</p> <p>3 remit U.S. sales taxes from its U.S. customers?</p> <p>4 A. We're not obliged to do that.</p> <p>5 Q. I'm sorry?</p> <p>6 A. After -- after I advise from a professional,</p> <p>7 we are told that that is not necessary.</p> <p>8 Q. So it does not collect and remit U.S. sales</p> <p>9 tax?</p> <p>10 A. No.</p> <p>11 Q. How many employees does -- sorry. I already</p> <p>12 asked you that question. Who is Linda Lorenz?</p> <p>13 A. Linda Lorenz is a person working for Jentre</p> <p>14 Products.</p> <p>15 Q. She works for Jentre?</p> <p>16 A. Jentre.</p> <p>17 Q. She does not work for Baronius Press?</p> <p>18 A. As an employee?</p> <p>19 Q. Correct.</p> <p>20 A. No.</p> <p>21 Q. What does Linda Lorenz do for Baronius</p> <p>22 Press?</p> <p>23 A. Accept -- they are our fulfillment</p> <p>24 warehouse. Occasionally we ask her to do other admin</p> <p>25 stuff for us.</p>	<p>Page 24</p> <p>1 does -- performs administrative duties on behalf of</p> <p>2 Baronius. You tell me what she does.</p> <p>3 A. For example, when she -- when she sent</p> <p>4 something for us, she did sign for us the cap</p> <p>5 registration form. She acted as our -- as the agent.</p> <p>6 Q. When you say registration form, are you</p> <p>7 referring to the copyright registration form?</p> <p>8 A. Correct.</p> <p>9 Q. And why didn't you sign that?</p> <p>10 A. Because it had to be handwritten.</p> <p>11 Q. And so, I'm sorry, why didn't you just</p> <p>12 handwrite it?</p> <p>13 A. Because it would take some time to get to</p> <p>14 the U.S.A. and we wanted to register it as soon as</p> <p>15 possible.</p> <p>16 Q. And at the time Ms. Lorenz completed the</p> <p>17 copyright applications, she was not an employee of</p> <p>18 Baronius. Correct?</p> <p>19 A. That's correct.</p> <p>20 Q. How many titles does Baronius Press own?</p> <p>21 A. Own?</p> <p>22 Q. Uh-huh.</p> <p>23 A. I'm not sure how many.</p> <p>24 Q. Would you say it's less than 100 or more</p> <p>25 than 100?</p>